William L. Hames, WSBA #12193 1 Hames, Anderson, Whitlow & O'Leary, P.S. 601 W. Kennewick Avenue P.O. BOX 5498 3 Kennewick, WA 99336-0498 (509) 586-7797/ (509) 586-3674 fax 4 billh@hawlaw.com 5 6 7 8 UNITED STATES BANKRUPTCY COURT 9 EASTERN DISTRICT OF WASHINGTON 10 11 In Re: Lead Case No. 19-00473-FPC11 Jointly Administered 12 R & R TRUCKING, INC., and RICARDO CANTU AND ROSA CANTU, **OBJECTION TO U.S. TRUSTEE'S** 13 MOTION TO DISMISS OR CONVERT Debtors. 14 TO: JAMES D. PERKINS, Attorney for the United States Trustee 15 16 COME NOW the debtors in possession, by and through their attorney, William L. 17 Hames of Hames, Anderson, Whitlow & O'Leary, and hereby object to the U.S. Trustee's 18 Motion to Dismiss or Convert for the reason that Debtors Chapter 11 plan will be filed in 19 the very near future. 20 DATED THIS 4 day of September 2020. 21 HAMES, ANDERSON, WHITLOW & O'LEARY, P.S. Attorneys for Debtors/Debtors in Possession 22 23 BY: /s/William L. Hames WILLIAM L. HAMES, WSBA #12193 24 JOHN W. O'LEARY, WSBA # 33004 25

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OBJECTION TO U.S. TRUSTEE'S

MOTION TO DISMISS OR CONVERT - 1